

Annual 47 C.F.R. § 64.2009(e) CPNI Certification

EB Docket 06-36

Annual 64.2009(e) CPNI Certification for 2008

Date filed: February 29, 2008

Name of company covered by this certification: Harron Communications LP
d/b/a MetroCast Cablevision of New Hampshire LP
d/b/a MetroCast Communications of Connecticut LP
d/b/a MetroCast Communications of Mississippi
d/b/a Gans Communications LP

Form 499 Filer ID: 826744

Name of signatory: Steven A. Murdough

Title of signatory: Vice President of Operations

I, Steven A. Murdough, certify that I am an officer of the company named above, and acting as an agent of the company, that I have personal knowledge that the company has established operating procedures that are adequate to ensure compliance with the Commission's CPNI rules. *See* 47 C.F.R. § 64.2001 *et seq.*

Attached to this certification is an accompanying statement explaining how the company's procedures ensure that the company [is/] in compliance with the requirements set forth in section 64.2001 *et seq.* of the Commission's rules [attach accompanying statement].

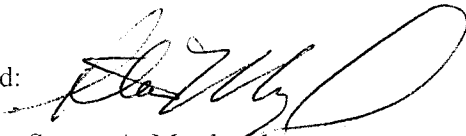
The company has not taken any actions (proceedings instituted or petitions filed by a company at either state commissions, the court system, or at the Commission against data brokers) against data brokers in the past year. Companies must report on any information that they have with respect to the processes pretexters are using to attempt to access CPNI, and what steps companies are taking to protect CPNI.

If affirmative:

The company has not received any customer complaints in the past year concerning the unauthorized release of CPNI (number of customer complaints a company has received related to unauthorized access to CPNI, or unauthorized disclosure of CPNI, broken down by category or complaint, *e.g.*, instances of improper access by employees, instances of improper disclosure to individuals not authorized to receive the information, or instances of improper access to online information by individuals not authorized to view the information).

If affirmative:

Signed:



Steven A. Murdough
Vice President of Operations

METROCAST CUSTOMER PROPRIETARY NETWORK INFORMATION (CPNI) PROTECTION PROCESS

All customer account information must be protected at all times.
Failure to comply with this process may result in fines by the
Federal Communications Commission (FCC) of up to \$100,000
per incident.

THE FCC DEFINES CPNI AS ...

...information that providers of telecommunications services acquire about their subscribers, including which telecommunications services are used and the specific types or patterns of use. This could include optional services subscribed to, current or historical account charges, directory assistance charges, usage data and calling patterns.

WHICH SUBSCRIBERS ARE AFFECTED

All **MetroCast Digital Phone** customers are required to establish a 4-digit Personal Identification Number (PIN) and steps will be taken at every customer contact to verify the identity of the customer.

METHODS OF CONFIRMING CUSTOMER IDENTITY

The primary method of confirming a customer's identity, whether in person or by phone, is via PIN established by the customer and retained within the memo section of the CSG account.

For instances where a customer cannot recall the account PIN, or a PIN is not found on the customer account, Photo ID may be used in-person and call-in customers may receive a callback from a CSR at the MetroCast Digital Phone number on the voice account.

CUSTOMER IDENTITY VERIFICATION and DOCUMENTATION

1. CSR's will require every Digital Voice customer to establish a PIN number during the Digital Voice order creation process. The PIN will be documented in the memo section of customer accounts in CSG.
2. CSR's will require every Digital Voice customer to recite the PIN number noted on the customer account before discussing:

- *Information that relates to the quantity, technical configuration, type, destination, and amount of use of a telecommunications service subscribed to by any customer of a telecommunications carrier, and that is made available to the carrier by the customer solely by the virtue of the carrier-customer relationship*
- *Information contained in the bills pertaining to telephone exchange service or telephone toll service received by a customer of a carrier; except that such term does not include subscriber list information.*

The information in italics is directly quoted from the FCC at http://www.fcc.gov/Bureaus/Common_Carrier/Orders/1998/da980971.txt

For MetroCast purposes, the only Digital Voice account items NOT protected by CPNI are customer name, customer address and telephone number, unless the telephone number is unlisted. If unlisted, the telephone number is also considered CPNI.

3. Customers who cannot recall their PIN, or whose identities must be confirmed before establishing a PIN, may be called back at their MetroCast Digital Phone number on the account. Alternate reach numbers listed on the account are not acceptable for callback purposes.
4. There are NO other methods for a customer to identify themselves at this time.

****CSR's may change a customer's PIN at the customer's request AFTER confirming the customer's identity.**

WHAT CANNOT BE USED AS A PIN

1. Last 4 of SSN or any portion of
2. Last 4 of home telephone number
3. 4 same-character numbers
4. Street Number or portion of
5. Date of birth

EXAMPLES FOR PIN SUGGESTIONS

1. Garage door opener code
2. Alarm code
3. ATM PIN
4. Any random 4-digit number

WHAT CANNOT BE USED TO IDENTIFY A CUSTOMER

1. Social Security Number
2. Physical or Mailing Address
3. Telephone Number

4. Email address
5. Date of Birth
6. Any other non-secure and easily obtainable information

WHAT CAN BE USED TO IDENTIFY A CUSTOMER

1. PIN number on the customer account in CSG
2. Photo ID issued by a local, state or federal government agency
3. Customer callback to the MetroCast Digital Phone number on the account

Because the Digital Phone number may be CPNI, the customer should always provide the Digital Phone number to the CSR. A CSR should NEVER provide the Digital Phone number to the customer to confirm the correct account is being accessed.

Example: Mr. Jones comes into a lobby to discuss his account and the CSR pulls up the account in CSG using his last name. Even with the account pulled up, Mr. Jones would have to give the Digital Phone number to the CSR prior to discussing his voice account.

CUSTOMER NOTIFICATION PROCESS

- Whenever a customer PIN, name or address is changed on the CSG account, a customer notification letter is required to be mailed.
- CSR's will print the appropriate letter for the respective system, fill in the date of the change, fill out an outbound envelope and submit the letter for mailing as soon as possible.
- Notes shall be placed in the memo section of CSG stating a letter was mailed advising the customer of the account changes.

CUSTOMER SERVICE MANAGEMENT ACCOUNTABILITY

- Every customer service supervisor and manager is responsible for ensuring this process is adhered to at all times and by all Customer Service Representatives.
- Breaches, or suspected breaches, of customer proprietary information must be **immediately** reported to the Director of Customer Service for investigation. General Managers of the respective system(s) will also be notified.
- Training on the CPNI process must be completed as soon as possible for current employees and as part of the orientation process for new employees.

CPNI REFERENCES

http://hraunfoss.fcc.gov/edocs_public/attachmatch/FCC-07-22A1.pdf

<http://www.fcc.gov/eb/CPNI/>

http://www.fcc.gov/Bureaus/Common_Carrier/Orders/1998/da980971.txt